

## **INFORMATION**

### **on personal data processing activities**

### **of the clients of NEXT LEVEL FITNESS EOOD**

**Dear clients,**

As of 25 May 2018, all EU Member States, including the Republic of Bulgaria, have adopted a **General Data Protection Regulation (GDPR)**, whose full name is Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data.

#### **I. What are your legal rights under the General Data Protection Regulation:**

In order to achieve a fair and transparent processing of your personal data by Next Level Fitness EOOD ("the Company"), we kindly invite you to familiarize yourself with your rights under the General Data Protection Regulation, namely:

**1.** Upon your request, you have the right to receive the personal data concerning you that the Company holds about you in its capacity as personal data controller in a structured, commonly used and machine-readable format;

**2.** You have the right to request that Next Level Fitness EOOD transfers this data directly to another controller without hindrance from us;

**3.** In the event of a change in the circumstances of your personal data, you have the right to request that we rectify such data, as well as the right to request the erasure of some or all of the personal data that you have provided to the Company and that it processes, provided that no legal obligation to process, including the storage of such data, applies to Next Level Fitness EOOD. Such an obligation applies for as long as your contractual relationship with Next Level Fitness EOOD lasts and for a certain period thereafter (see below in the next section), as the processing of personal data is necessary for the performance of the Company's obligations under the agreement entered into;

**4.** If you have given your consent for us to process your data for direct marketing purposes, then you have the right to withdraw your consent and ask us to immediately delete your personal data from our databases, provided that no other legal obligation to process it applies to Next Level Fitness EOOD;

**5.** You have the right to object to the processing of your personal data where you consider that it is not being processed lawfully, and to request restriction of processing by us;

**6.** In the event of a dispute with the Company, you have the right to complain to the Personal Data Protection Commission about the lawfulness of your personal data processing activities.

**N.B.!** You can exercise the rights under the preceding paragraphs by submitting a written or electronic application to the address of Next Level Fitness EOOD in Sofia, p.c. 1700, Studentski district, blvd. 35 „Simeonovsko Shose", fl. 3, or by submission to the following e-mail address: [info@nextlevelclub.bg](mailto:info@nextlevelclub.bg).

#### **II. Purpose and grounds for processing. Data retention periods:**

**A)** Your personal data will be processed, including stored, by the Company solely for the purpose of fulfilling the contractual relationship between you and Next Level Fitness EOOD, as well as to comply with any legal obligations applicable to the Company.

**B)** The legal grounds for the processing of your personal data by Next Level Fitness EOOD are: **(1)** the existence of an agreement for sports or other services between the parties, which is related with creation and administration of a profile (account) in the online customers area of „Next Level“ fitness clubs, through which, as well as through the Next Level Fitness App mobile app the concluded contract for the provision of sports services is executed; **(2)** the performance of a legal obligation under Bulgarian law applicable to Next Level Fitness EOOD as a taxable entity registered in the Republic of Bulgaria, and **(3)** the protection of Next Level Fitness EOOD's legitimate interest in the security and protection of the property of its clients and the Company by carrying out video surveillance in the Company's fitness centers.

In the case of processing your data for direct marketing purposes, the grounds are your voluntary and informed consent, if you wish to provide it.

**C)** The period during which the Company is legally obliged to process your personal data, the law specifies to:

- for data contained in accounting documents - 10 (ten) years from 1 January of the accounting period following the accounting period to which they relate;

- for data contained in all other documents, including records in electronic systems and paper archives - up to 5 (five) years from the termination of the contractual relationship between the client and the Company;

- for direct marketing purposes - until you explicitly withdraw your consent to do so.

**D)** Video surveillance:

In order to protect your safety, as well as to protect the rights and legitimate interests of Next Level Fitness EOOD the Company's fitness centers are under constant video surveillance. Please note that there is an information board with text warning of this fact installed in the premises where video surveillance is in place, or immediately outside these premises. The recordings from the cameras will be stored in specially designated rooms with a secure database and will be accessible only to authorised persons who are carrying out the security of the premises and, if necessary, access to the video recordings will also be granted to the competent authorities in the event of a crime or suspected crime. Video recordings shall be automatically deleted after a maximum of 60 (sixty) calendar days after they have been made, except in cases where they contain evidence of a public order offence or a criminal offence, in which case we shall be subject to an obligation to keep them for a longer period.

### **III. Transfer of your personal data to public authorities and third parties:**

Please also note that Next Level Fitness EOOD only passes your personal data to the following categories of persons:

1. the competent state and municipal authorities for the purposes of tax control;
2. specialized companies that carry out technical maintenance of the software products operated by the Company for the purpose of carrying out the technical maintenance itself - they only have access to your data insofar as they have access to the system product itself, which is carried out under the supervision of an employee of the Company in order to maximize the protection of your data.

3. partners and suppliers who may process your personal data as independent data controllers or act on our behalf as data processors. We disclose to these recipients only those of your personal data that are minimally necessary for the performance of the relevant service directly related to the contract between you and the Company. Furthermore, when we disclose your data to processors on our behalf, we take all necessary measures to ensure that your data will be processed in compliance with all legal requirements and that the processor has taken the necessary technical and organisational measures to protect the data.

Persons to whom we may disclose your personal data include payment service providers who will process your payment for sports service agreements and other products, courier service providers, etc.

#### **IV. The security of your data is a priority for us:**

Please be advised that Next Level Fitness EOOD takes the security of your personal data seriously. We apply an appropriate level of protection and to this end we have developed reasonable physical, electronic and documentary procedures to safeguard the data we collect from accidental or unlawful destruction, loss, alteration, unauthorised disclosure or access to personal data transmitted, stored or otherwise processed. Our information security policies and procedures are closely linked to widely accepted international standards and are regularly reviewed and updated as necessary to meet our business needs, changes in technology and regulatory requirements. Access to your personal data is only permitted to those employees, service providers of the Company on a need-to-know basis for business purposes or who require it to perform their job or contractual duties.

#### **V. Contact details of the data controller:**

Next Level Fitness EOOD, with UIC 204479347, with seat and registered address: Sofia, p.c. 1700, Studentski district, blvd. 35 „Simeonovsko Shose“, fl. 3, represented by the Managers Tzvetelina Trendafilova and Marek Trepko.

If you have any questions about this information, or if you have any suggestions or opinions about the way in which Next Level Fitness EOOD processes your data, please do not hesitate to contact us.

**Sincerely,  
The Next Level Fitness EOOD Team**